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5 Attorney for Defendant
6 RAMESH BIRLA

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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,
12
13 Plaintiff,

14 v.

15 RAMESH BIRLA,
16
17 Defendant

CASE NO. 2:23-CR-00094 DJC

**STIPULATION TO CONTINUE
SENTENCING HEARING; ORDER**

18 Defendant RAMESH BIRLA, by and through his counsel of record, TONI WHITE, and the
19 GOVERNMENT, by and through Assistant United States Attorney ADRIAN KINSELLA hereby
stipulate as follows:

- 20 1. By previous order, this matter was set for status conference on July 31, 2025.
- 21 2. By this stipulation, defendant now moves to continue the status conference until
22 October 23, 2025, and to exclude time between July 31, 2025 and October 23, 2025,
23 under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
- 24 3. The parties agree and stipulate, and request that the Court find the following:
- 25 a) Discovery associated with this case includes over 35 gigabytes of evidence in
26 electronic form, including: investigative reports and related documents, covertly
27 recorded videos, pictures, and calls; recorded statements by the defendants and
28 other witnesses, and other evidence. Many of the audio recordings are in the

Punjabi language. Additional discovery, released just prior to the last status conference, consisted of data and downloads of multiple cell phones. Lastly, the Government has represented that there is additional discovery to be provided, although it will not be voluminous.

b) The Government does not object to the continuance.

c) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

d) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of July 31, 2025 to October 23, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act may exclude additional time periods from the period within which trial must begin.

IT IS SO STIPULATED.

Dated: July 25, 2025

KIMBERLY A. SANCHEZ
Acting United States Attorney

By: /s/ Adrian Kinsella
ADRIAN KINSELLA
Assistant U.S. Attorney

For the United States

Dated: July 25, 2025

By: /s/ Toni White
TONI WHITE

For Defendant Ramesh Birla

ORDER

IT IS SO FOUND AND ORDERED.

Dated: July 25, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE